

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ANGELA LYNNE MARTIN, Individually
and as Administratrix of the ESTATE OF
HOWARD EDWARD MARTIN, JR.,

Plaintiff,

v.

NORFOLK SOUTHERN RAILWAY CO.,
TODD MICHAEL BUBNIS, JAMES
ERNEST MOFFETT and CLINTON
TOWNSHIP,

Defendants.

CIVIL ACTION

NO. 4:15-CV-02034-MWB

JURY TRIAL DEMANDED

ORDER

AND NOW, this day of , 2017, upon
consideration of Plaintiffs' Motion for Leave to Amend the Complaint to Add EAST COAST
RIGHT OF WAY MAINTENANCE, INC. as a defendant, and any response thereto, it is hereby
ORDERED that Plaintiffs' Motion is **GRANTED**.

Plaintiffs are hereby granted leave to file an Amended Complaint adding EAST COAST
RIGHT OF WAY MAINTENANCE, INC. as a defendant.

BY THE COURT:

_____, J.

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**PLAINTIFFS' MOTION FOR LEAVE TO AMEND THE COMPLAINT TO ADD
EAST COAST RIGHT OF WAY MAINTENANCE, INC. AS A DEFENDANT**

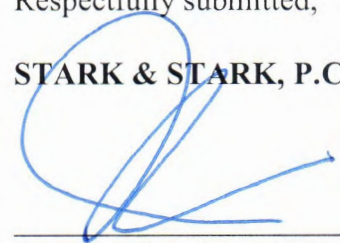
Plaintiff, ANGELA LYNNE MARTIN, Individually and as Administratrix of the ESTATE OF HOWARD EDWARD MARTIN, JR., by and through her undersigned counsel, Stark & Stark, hereby moves this Honorable Court for leave, pursuant to Fed.R.Civ.P. 15 and 20(a)(2) and L.R. 15.1, to amend her Complaint to add EAST COAST RIGHT OF WAY MAINTENANCE, INC. (herein "ECROW") as a defendant. In support thereof, plaintiff files herewith and relies on the attached supporting Brief.

For the reasons set forth in plaintiff's attached Brief, plaintiff respectfully requests that this Honorable Court enter an Order granting leave to file an Amended Complaint to add ECROW as a defendant.

Respectfully submitted,

STARK & STARK, P.C.

BY:



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DATED: 2/10/17

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CERTIFICATION OF SERVICE

I, Michael C. Ksiazek, Esquire, hereby certify that a true and correct copy of Plaintiffs' Motion for Leave to Amend the Complaint to Add East Coast Right of Way Maintenance, Inc. as a Defendant was forwarded to all counsel of record by e-filing on February 15, 2017.

STARK & STARK
A Professional Corporation

By: 

MICHAEL C. KSIAZEK
Attorneys for Plaintiffs